BARNETT WADDINGHAM
beyond the expected

The AIG Pension Plan

Statement of Investment Principles

Barnett Waddingham LLP

June 2025

BARNETT WADDINGHAM
beyond the expected

Contents

1. Introduction 3
2. Choosing investments 3
3. Investment objectives 4
4. Kinds of investments to be held 4
5. The balance between different kinds of investments 4
6. Risks 5
7. Expected return on investments 6
8. Realisation of investments 6
9. Environmental, Social and Governance factors, voting and engagement 6
10. Policy on arrangements with asset managers 7
11. Agreement 8

Appendix 1: Investment policy of the Plan as at July 2021 9

Appendix 2: Note on financially material considerations, the exercise of rights and engagement activities, and non-financial matters 12

1. Introduction

1.1. This is the Statement of Investment Principles prepared by the Trustees of The AIG Pension Plan ("the Plan"). This statement sets down the principles which govern the decisions about investments that enable the Plan to meet the requirements of:

- the Pensions Act 1995, as amended by the Pensions Act 2004; and
- the Occupational Pension Schemes (Investment) Regulations 2005 as amended by the Occupational Pension Schemes (Investment) (Amendment) Regulations 2010;
- the Occupational Pension Schemes (Investment and Disclosure) Regulations 2018; and
- the Occupational Pension Schemes (Investment and Disclosure) (Amendment) Regulations 2019.

1.2. In preparing this statement the Trustees have consulted American International Group UK Limited, the Principal Employer, and obtained advice from Barnett Waddingham LLP, the Trustees' investment consultants. Barnett Waddingham is authorised and regulated by the Financial Conduct Authority.

1.3. This statement has been prepared with regard to the 2001 Myners review of institutional investment (including subsequent updates), and Plan Funding legislation.

1.4. The Trustees will review this statement at least every three years or if there is a significant change in any of the areas covered by the statement.

1.5. The investment powers of the Trustees are set out in Clause 6.1 of the Definitive Trust Deed & Rules, updated in December 2016. This statement is consistent with those powers.

2. Choosing investments

2.1. The Trustees' policy is to set the overall investment target and then monitor the performance of their managers against that target. In doing so, the Trustees consider the advice of their professional advisers, who they consider to be suitably qualified and experienced for this role.

2.2. The day-to-day management of the Plan's assets is delegated to one or more investment managers. The Plan's investment managers are detailed in Appendix 1 to this Statement. The investment managers are authorised and regulated by the Financial Conduct Authority, and are responsible for stock selection and the exercise of voting rights.

2.3. The Trustees review the appropriateness of the Plan's investment strategy on an ongoing basis. This review includes consideration of the continued competence of the investment managers with respect to performance within any guidelines set. The Trustees will also consult the Employer before amending the investment strategy.

3. Investment objectives

3.1. The Trustees have discussed key investment objectives in light of an analysis of the Plan's liability profile as well as the constraints the Trustees face in achieving these objectives. As a result, the Trustees' main investment objectives are:

- To achieve, over the long term, a return on the investments which is consistent with the long term assumptions of the Plan Actuary in determining the funding of the Plan with a level of risk considered appropriate.
- To consider the interests of the Employer in relation to the size and volatility of the Employer's contribution requirements.
- To achieve a favourable return against the benchmark where applicable.

3.2. The Trustees are aware of the relationship that exists between the particular investment portfolio that is held and the level of funding of the Plan's liabilities. The Trustees have obtained exposure to investments that they expect will meet the Plan's objectives as best as possible.

4. Kinds of investments to be held

4.1. The Plan is permitted to invest in a wide range of assets including equities, bonds, cash, property and alternatives.

4.2. The Trustees monitor from time-to-time the employer-related investment content of their portfolio as a whole and will take steps to alter this should they discover this to be more than 5% of the portfolio. Typically, this check is carried out annually by the Plan's auditors.

5. The balance between different kinds of investments

5.1. The Plan invests in assets that are expected to achieve the Plan's objectives. The allocation between different asset classes is contained within Appendix 1 to this Statement.

5.2. The Trustees consider the merits of both active and passive management for the various elements of the portfolio and may select different approaches for different asset classes. The current arrangements are set out in Appendix 1 to this Statement.

5.3. From time to time the Plan may hold cash and therefore deviate from its strategic or tactical asset allocation in order to accommodate any short-term cashflow requirements or any other unexpected items.

5.4. The Trustees are aware that the appropriate balance between different kinds of investments will vary over time and therefore the Plan's asset allocation will be expected to change as the Plan's liability profile matures.

6. Risks

6.1. The Trustees have considered the following risks for the Plan with regard to its investment policy and the Plan's liabilities, and has considered ways of managing/monitoring these risks:

Risk versus the liabilities	The Trustees will monitor and review the investment strategy with respect to the liabilities in conjunction with each actuarial valuation. Liability driven investment (LDI) is employed to manage the impact of fluctuations in interest rates and inflation on the Plan's funding level. The investment strategy is set with consideration to the appropriate level of risk required for the funding strategy as set out in the Plan's Statement of Funding Principles. The Trustees also receive regular funding updates such that they can review the development of the assets compared to the liabilities.
Covenant risk	The creditworthiness of the Employer and the size of the pension liability relative to the Employer's earnings are monitored periodically. The appropriate level of investment risk is considered with reference to the strength of the Employer covenant.
Solvency and mismatching	This risk is addressed through the asset allocation strategy and ongoing triennial actuarial valuations. The Trustees are aware that the asset allocation required to minimise the volatility of the solvency position may be different from that which would minimise the volatility on the Plan's funding basis.
Asset allocation risk	The asset allocation is detailed in Appendix 1 to this Statement and is monitored on a regular basis by the Trustees.
Investment manager risk	The Trustees monitor the performance of each of the Plan's investment managers on a regular basis via half yearly reporting from the investment consultant in addition to having meetings with each manager from time to time. The Trustees have a written agreement with each investment manager, which contains a number of restrictions on how each investment manager may operate.
Governance risk	Each asset manager is expected to undertake good stewardship and positive engagement in relation to the assets held. The Trustees monitor these and will, where appropriate, report on the managers' practices in their annual Implementation Statement.
ESG/Climate risk	The Trustees have considered long-term financial risks to the Plan and believe ESG factors as well as climate risk are potentially financially material. The Trustees will continue to develop the policy to consider these, alongside other factors, when selecting or reviewing the Plan's investments.
Concentration risk	Each investment manager is expected to manage broadly diversified portfolios and to spread assets across a number of individual shares and securities.
Liquidity risk	The Plan invests in assets such that there is a sufficient allocation to liquid investments that can be converted into cash at short notice given the Plan's cashflow requirements. The Plan's administrators assess the level of cash held in order to limit the impact of the cashflow requirements on the investment policy.

Currency risk	The Plan's liabilities are denominated in sterling. The Plan may gain exposure to overseas currencies by investing in assets that are denominated in a foreign currency or via currency management. Currency hedging is employed at the discretion of active managers to manage the impact of exchange rate fluctuations.
Loss of investment	The risk of loss of investment by each investment manager and custodian is assessed by the Trustees. This includes losses beyond those caused by market movements (e.g. default risk, operational errors or fraud). The Trustees undertake regular reviews of the internal controls and processes of each of the investment managers.

7. Expected return on investments

7.1. The Trustees have regard to the relative investment return and risk that each asset class is expected to provide. The Trustees are advised by its professional advisors on these matters, who they deem to be appropriately qualified experts. However, the day-to-day selection of investments is delegated to the investment managers.

7.2. The Trustees recognise the need to distinguish between nominal and real returns and to make appropriate allowance for inflation when making decisions and comparisons.

7.3. In considering the expected return from investments, the Trustees recognise that different asset classes have different long-term expected returns and expected volatilities relative to the liabilities.

7.4. Having established the investment strategy, the Trustees monitor the performance of each investment manager against an agreed benchmark as frequently as appropriate according to market conditions and the Plan's funding position. The Trustees meet the Plan's investment managers as frequently as is appropriate in order to review performance.

8. Realisation of investments

8.1. The Trustees have delegated the responsibility for buying and selling investments to the investment managers. The Trustees have considered the risk of liquidity as referred to above.

8.2. Ultimately, the investments will all have to be sold when the Plan's life comes to an end. In this situation, the Trustees are aware of the fact that the realisable value of some investments, were there to be a forced sale, might be lower than the market value shown in the Plan accounts.

9. Financially material considerations, non-financially material considerations, the exercise voting rights and engagement activities

9.1. The Trustees have set policies in relation to these matters. These policies are set out in Appendix 2.

10. Policy on arrangements with asset managers

Incentivising alignment with the Trustees' investment polices

10.1. Prior to appointing an investment manager, the Trustees consider the investment manager's capabilities and, therefore, their perceived likelihood of achieving the expected return and risk characteristics (including ESG and climate related risks) for the asset classes being selected for. Should the investment objective of a particular fund change, the Trustees will review the fund appointment to ensure it remains appropriate and consistent with the Trustees' wider investment objective.

10.2. The Trustees look to its investment consultant to conduct continuous assessment of the investment manager's idea generation, portfolio construction, implementation and business management to evaluate the manager's ability to outperform over a full market cycle. The consultant's manager research ratings assist with due diligence and questioning managers during presentations to the Trustees and are used in decisions around selection, retention and realization of manager appointments.

10.3. The Trustees consider the Plan's investment strategy at least every three years where they assess the continuing relevance of the strategy in the context of the Plan's membership and their aims, beliefs and constraints. The Trustees will review the appropriateness of using active and passive managed funds (on an asset class basis) on an ad-hoc basis.

10.4. As the Trustees invest in pooled investment vehicles they accept that they have no ability to specify the risk profile and return targets of the managers, but appropriate mandates can be selected to align with the overall investment strategy.

10.5. Investment manager ESG policies are reviewed in the context of best industry practice and feedback will be provided to the investment manager.

Incentivising assessments based on medium to long term, financial and non-financial considerations

10.6. The Trustees are mindful that the impact of ESG and climate change has a long-term nature. The Trustees will consider the investment consultant's assessment of how the managers embed ESG into its investment process and how the managers' responsible investment philosophy aligns with the Trustees' responsible investment policy. This includes the managers' policy on voting and engagement.

10.7. The Trustees meet with the investment managers at Trustees' meetings as required and may challenge decisions made including voting history and activity. The Trustees delegate all voting and engagement activities to the investment managers. When required the Trustees will question the managers' voting decisions if they deem them out of line with the investment fund's objectives or the objectives / policies of the Plan.

10.8. The investment managers are aware that their continued appointment is based on their success in delivering the mandate for which they have been appointed to manage. This includes the management of ESG and climate related risks If the Trustees are dissatisfied, then they will look to replace the manager. The investment managers have been made aware of this.

Method and time horizon for assessing performance

10.9. The Trustees monitor the performance of their investment managers over medium to long term periods that are consistent with the Trustees' investment aims, beliefs and constraints.

10.10. Part of the Plan's investments are in pooled funds. The investment manager is remunerated by the Trustees based on the assets they manage on behalf of the Trustees. As the funds grow, due to successful investment by the investment manager, they receive more and as values fall they receive less.

10.11. The Trustees believe that this fee structure, including the balance between any fixed and performance related element, enables the investment manager to focus on long-term performance without worrying about short term dips in performance significantly affecting their revenue.

10.12. The Trustees ask the Plan's investment consultant to assess if the asset management fee is in line with the market when the manager is selected, and the appropriateness of the annual management charges are considered from time to time.

Portfolio turnover costs

10.13. The Trustees acknowledge that portfolio turnover costs can impact on the performance of their investments. Overall performance is assessed as part of the investment monitoring process.

10.14. During the investment manager appointment process, the Trustees may consider both past and anticipated portfolio turnover levels. When underperformance is identified, deviations from the expected level of turnover may be investigated with the investment manager concerned if it is felt they may have been a significant contributor to the underperformance. Assessments reflect the market conditions and peer group practices. The Trustees acknowledge that for some asset classes, such as LDI, a higher turnover of contracts such as repurchase agreements, can be beneficial to the fund from both a risk and cost perspective.

Duration of arrangement with asset manager

10.15. For the open-ended pooled funds in which the Plan invests, there are no predetermined terms of agreement with the investment managers.

10.16. The suitability of the Plan's asset allocation and its ongoing alignment with the Trustees' investment beliefs is considered every three years, or when changes deem it appropriate to do so more frequently. As part of this review the ongoing appropriateness of the investment managers, and the specific funds used, is considered.

11. Agreement

11.1. This statement was agreed by the Trustees, and replaces any previous statements. Copies of this statement and any subsequent amendments will be made available to the Employer, the investment managers, the actuary and the Plan auditor upon request.

Signed:..... **Date:**.....

On behalf of the Trustees of The AIG Pension Plan

BARNETT WADDINGHAM
beyond the expected

Appendix 1: Investment policy of the Plan in relation to the current Statement of Investment Principles

1. Choosing investments

The Trustees have appointed Legal & General Investment Management ("L&G") to carry out the day-to-day investment of the Plan. L&G is authorised and regulated by the Financial Conduct Authority.

The Plan has a strategic asset allocation as set out in the table below, which has been agreed after considering the Plan's liability profile, funding position, expected return of the various asset classes and the need for diversification.

Fund	Target allocation (%)	Control range (%)
L&G Single-Stock Gilt Funds	65.0	±10.0
L&G Buy & Maintain Credit Fund	27.5	±5.0
L&G AAA-AA-A Bonds-All Stocks Index	2.5	±2.5
L&G UK Treasury Bills Fund	5.0	-

Rebalancing

Objectives of Rebalancing Policy

- To retain the overall level of portfolio risk within a reasonable tolerance range, such that there is no significant alteration in the level of expected return or volatility of the Plan's assets;
- To use cash flow where appropriate to minimize the transaction costs and the extent of intervention by the Trustees; and
- For the Trustees to retain some over-riding control of the Plan's strategic asset allocation, but for any rebalancing to be carried out in a timely manner.

On receipt of each half-yearly performance report, the Investment Sub-Committee will review the position of the Plan against the benchmark and ranges above. If a range has not been breached, the Investment Sub-Committee will assess where cashflows should be invested/disinvested over the upcoming quarter, in line with the Plan's target asset allocation. If a range has been breached, the investment managers will normally be instructed to move monies such that the allocation where the range is breached will be moved back to half-way between the limit breached and the benchmark allocation. However, circumstances will periodically arise when this is not considered appropriate. In this case any proposal not to re-balance will be referred to the full Trustee body and the decision minuted.

The Trustees have agreed a cashflow policy for sourcing cash to cover the Plan's ongoing cash requirements, as set out below:

Cash Buffer

- A cash buffer of £5m will be held in the L&G UK Treasury Bills Fund which is expected to be sufficient to cover the annual cash requirement for the Plan.
- The cash buffer will be topped up annually in Q1 of each year, or if the balance falls below £1m.
- The cash buffer amount will be reviewed alongside each annual top up to ensure it remains suitable for meeting the expected cash requirements of the Plan for the coming year.
- The Trustees will also periodically review the ongoing suitability of the L&G UK Treasury Bills Fund.

Sourcing Cash

- For any cash requirement, the Plan's administrator will first advise the pensions manager, who will then notify Barnett Waddingham.
- As default, any cash will be sourced firstly from the L&G UK Treasury Bills Fund.
- Should there be insufficient funds held in the L&G UK Treasury Bills Fund, then monies will be sourced from the shortest duration bond assets – which may be short-dated gilts, or corporate bonds. In doing so, this will ensure minimum impact on the liability hedging arrangements.

Performance Measurement

The majority of the monitoring of the Plan's assets is delegated to the Investment Sub-Committee. The Investment Sub-Committee however is required to report back to the Trustees on this issue at each Trustees' meeting. The Investment Sub-Committee receive regular funding updates from the Scheme Actuary at Mercer which provides an update on the development of the Plan's funding position.

The Trustees retain Barnett Waddingham as investment consultants to assist the Trustees in fulfilling their responsibilities for monitoring the investment strategy and managers. The Investment Sub-Committee receive regular reports and updates from Barnett Waddingham. These reports analyse the performance of the investment strategy and managers' assets in detail.

The Trustees do not currently employ an independent performance monitoring service; however, Barnett Waddingham provide monitoring of the Plan's assets and funding level on a monthly basis (that takes into account the assets managed by L&G).

The Investment Sub-Committee receive regular reports from the investment managers, which analyse the performance and strategic allocation of the Plan's assets in detail. In addition, the investment Sub-Committee also regularly meet with the managers to gain a greater understanding of their performance.

Additional Voluntary Contributions ('AVCs')

Members can invest additional voluntary contributions in an insurance policy issued by Aviva (formerly Friends Provident Group).

Following the sale of Equitable Life to Utmost Life, members' balances held with Equitable Life were transferred to Utmost Life.

Following closure of the Plan to future accrual in October 2012, members are not able to make further contributions to the AVC arrangements.

The Trustees, with the assistance of their advisers, review these arrangements from time to time to ensure that the investment performance achieved is acceptable and the investment profile of the funds remains consistent with the objectives of the Trustees and the needs of the members.

2. Investment Benchmarks and objectives

The investment benchmarks and objectives for each investment manager, are given below.

Fund	Benchmark	Objective
L&G Single-Stock Gilt Funds	Relevant gilt index for each individual fund	Track the relevant gilt index benchmark
L&G Buy & Maintain Credit Fund	N/A	Capture the credit risk premium and preserve value over the course of the credit cycle, avoiding defaults and significant impairments
L&G AAA-AA-A Bonds-All Stocks Index	Markit iBoxx £ Non-Gilts (ex-BBB) Index	Track the benchmark to within +/- 0.5% p.a. for two years out of three
L&G UK Treasury Bills Fund	Sterling Overnight Index Average (SONIA)	Provide a low risk, highly liquid portfolio of UK Treasury Bills

The performance of the investment managers will be monitored as frequently as the Trustees consider appropriate in light of the prevailing circumstances. The monitoring takes into account both short-term and long-term performance.

3. Investment Fees

Fund	Fees
L&G Single-Stock Gilt Funds	0.045% p.a.
L&G Buy & Maintain Credit Fund	0.126% p.a.
L&G AAA-AA-A Bonds-All Stocks Index	0.108% p.a.
L&G UK Treasury Bills Fund	0.125% p.a. on the first £5m 0.100% p.a. on the next £5m 0.075% p.a. on the next £20m

Appendix 2: Financially material considerations, non-financially material considerations, the exercise of voting rights and engagement activities

Socially Responsible Investment, Corporate Governance and Voting Rights

The Trustees have considered long-term financial risks to the Plan and believe that environmental, social and governance factors are financially material and therefore has a policy to consider these, alongside other factors, when selecting or reviewing the Plan's investments.

Given the maturity profile of the Plan and the objective to fund member benefits from the Plan's assets as they fall due, the Trustees have a long-term time horizon over which it takes into account the financial materiality of ESG factors (including, but not limited to, climate change).

From time to time, the Trustees may ask the Plan's investment managers to attend meetings and provide updates on the funds, which the Trustee may request to include an update on ESG considerations.

When selecting new investments, an investment manager's excellence in relation to ESG considerations will not take precedence over other factors, including (but not limited to) historical performance or fees.

As the Plan holds assets in pooled funds through L&G, social, environmental and governance considerations are set by L&G, whom are signatories to the UN Principles of Responsible Investment.

Policy on stewardship

The Trustees believe that good stewardship and positive engagement can lead to improved governance and potentially better risk-adjusted investor returns.

As an investor in pooled funds, the Trustees currently adopt the policy of delegating the exercise of the rights (including voting rights) attaching to the Plan's investments to the investment managers, who are signatories to the UK Stewardship Code.

The Trustees also delegate undertaking engagement activities, which include entering into discussions with employer management in an attempt to influence behaviour, to the investment managers.

In selecting and reviewing their investment manager, where appropriate and applicable, the Trustees will consider the investment manager's policies on engagement and ESG and how those policies have been implemented.

Financially Material Considerations

The Trustees consider that factors such as environmental, social and governance (ESG) issues (including but not limited to climate change) will potentially be financially material for the Plan over the length of time during which the Plan provides benefits directly to members.

The Trustees have elected to invest the Plan's assets through pooled funds. The choice of underlying funds is made by the Trustees after taking advice from their investment consultant. The Trustees, and the managers of the underlying funds, take into account ESG factors (including climate change risks) in their decisions in relation to the selection, retention and realisation of investments.

The Trustees take those factors into account in the selection, retention and realisation of investments as follows:

Selection of investments: assess the investment managers' ESG integration credentials and capabilities, including stewardship, as a routine part of requests for information/proposals as well as through other regular reporting channels.

Retention of investments: The Trustees will monitor ESG considerations on an ongoing basis by seeking information on the responsible investing policies and practices of the investment managers as and when necessary.

Realisation of investments: The Trustees will request information from investment managers about how ESG considerations are taken into account in decisions to realise investments.

The Trustees will also take those factors into account as part of its investment process to determine a strategic asset allocation, and consider them as part of ongoing reviews of the Plan's investments.

The Trustees will continue to monitor and assess ESG factors, and risks and opportunities arising from them, as follows:

- The Trustees will obtain training on ESG considerations from time to time in order to understand how ESG factors including climate change could impact the Plan and its investments;
- As part of ongoing monitoring of the Plan's investment managers, the Trustees will use any ESG ratings information available within the pensions industry or provided by its investment consultant, to assess how the Plan's investment managers take account of ESG issues; and
- Through their investment consultant the Trustees will request that all of the Plan's investment managers provide information about their ESG policies, and details of how they integrate ESG into their investment processes on an annual basis.

Non-financially material considerations

The Trustees do not take into account the views of Plan members and beneficiaries in relation to ethical considerations, social and environmental impact, or present and future qualify of life of the members and beneficiaries of the Plan (referred to as "non-financial matters" in the relevant Regulations) in the selection, retention and realisation of investments.

The exercise of voting rights

The Trustees' policy on the exercise of rights attaching to investments, including voting rights, and in undertaking engagement activities in respect of the investments is that these rights should be exercised by the investment managers on the Trustees' behalf. In doing so, the Trustees expect that the investment managers will use their influence as major institutional investors to exercise the Trustees' rights and duties as shareholders, including where appropriate engaging with underlying investee companies to promote good corporate governance, accountability and to understand how those companies take account of ESG issues in their businesses.

The Trustees will monitor and engage with the investment managers about relevant matters (including matters concerning an issuer of debt or equity, including their performance, strategy, capital structure, management of actual or potential conflicts of interest, risks, social and environmental impact and corporate governance), through the Plan's investment consultant.

Investment managers will be asked to provide details of their stewardship policy and engagement activities on at least an annual basis. The Trustees will, with input from their investment consultant, monitor and review the information provided by the investment managers. Where possible and appropriate, the Trustees will engage with their investment managers for more information and ask them to confirm that their policies comply with the principles set out in the Financial Reporting Council's UK Stewardship Code.

Engagement activities

The Trustees acknowledge the importance of ESG and climate risk within their investment framework. When delegating investment decision making to their investment managers they provide their investment managers with a benchmark they expect the investment managers to either follow or outperform. The investment manager has discretion over where in an investee company's capital structure it invests (subject to the restrictions of the mandate), whether directly or as an asset within a pooled fund.

The Trustees are of the belief that ESG and climate risk considerations extend over the entirety of a company's corporate structure and activities, i.e. that they apply to equity, credit and property instruments or holdings. The Trustees also recognise that ESG and climate related issues are constantly evolving and along with them so too are the products available within the investment management industry to help manage these risks.

The Trustees consider it to be a part of their investment managers' roles to assess and monitor developments in the capital structure for each of the companies in which the managers invest on behalf of the Plan or as part of the pooled fund in which the Plan holds units.

The Trustees also consider it to be part of their investment managers' roles to assess and monitor how the companies in which they are investing are managing developments in ESG related issues, and in particular climate risk, across the relevant parts of the capital structure for each of the companies in which the managers invest on behalf of the Plan.

Should an investment manager be failing in these respects, this should be captured in the Plan's regular performance monitoring.

The Plan's investment managers are granted full discretion over whether or not to invest in the Principal Employer's business. Through their consultation with the Principal Employer when setting this Statement of Investment Principles, the Trustees have made the Principal Employer aware of their policy on ESG and climate related risks, how they intend to manage them and the importance that the pensions industry as a whole, and its regulators, place on them.

The Plan's investment consultant is independent and no arm of their business provides asset management services. This, and their FCA Regulated status, makes the Trustees confident that the investment manager recommendations they make are free from conflict of interest.

The Trustees expect all investment managers to have a conflict of interest policy in relation to their engagement and ongoing operations. In doing so the Trustees believe they have managed the potential for conflicts of interest in the appointment of the investment manager and conflicts of interest between the Trustees/investment manager and the investee companies.

In selecting and reviewing their investment managers, where appropriate, the Trustees will consider investment managers' policies on engagement and how these policies have been implemented.